



Chairperson: Bob Wyatt, NW Natural
Treasurer: Fred Wolf, Legacy Site Services for Arkema

September 22, 2010

Chip Humphrey
Eric Blischke
U.S. Environmental Protection Agency, Region 10
805 SW Broadway, Suite 500
Portland, OR 97205

Re: Portland Harbor Sediment and Tissue Disposal (Lower Willamette River, Portland Harbor Superfund Site, USEPA Docket No: CERCLA-10-2001-0240)

Chip and Eric:

The Lower Willamette Group would like to proceed with disposal of archived Round 3 sediment and biota samples collected under the EPA Administrative Settlement Agreement and Order on Consent for the Remedial Investigation and Feasibility Study.

The Round 2 QAPP and Addenda specify that sediment and tissue samples will be retained for 12 months following completion of data validation. LWG Round 3 samples (which were collected in accordance with the Round 2 QAPP and Addenda) are currently being archived at the LWG field laboratory in Portland. The Round 3 sediment and tissue samples were collected during the following time period:

- Biota collected from 8/28/2007 – 1/20/2008
- Surface and subsurface sediments collected from 1/30/2007 – 1/17/2008
- Sediment trap sediments collected from 1/30/2007 to 2/1/2008

We are beyond 12 months from completion of data validation for Round 3 and the samples are past their appropriate holding times. Any further analysis of these samples would not meet the EPA recommended 1-year maximum holding time for frozen samples (LWG 2004 Round 2 QAPP and U.S. EPA Region 10 and Puget Sound Estuary Program 1997 *Recommended Guidelines for Measuring Organic Compounds in Puget Sound Water, Sediment, and Tissue Samples*).

In its December 23, 2009 letter regarding archived sediment samples for PBDE analysis, EPA noted our agreement that archived Round 3 samples would be retained until the draft RI and baseline risk assessment reports had been reviewed by EPA. EPA provided comments on the draft RI and baseline risk assessment reports on July 16, 2010 and none of the comments requested further analysis of archived samples. Therefore, the LWG intends to proceed with disposal of the samples consistent with the QAPP and Addenda. A subcontractor will be used for disposal of the sediment and biota samples stored at the LWG field laboratory.

Please confirm that the LWG may proceed with its contemplated course of action.

Sincerely,



Bob Wyatt

cc: Confederated Tribes and Bands of the Yakama Nation
 Confederated Tribes of the Grand Ronde Community of Oregon
 Confederated Tribes of Siletz Indians of Oregon
 Confederated Tribes of the Umatilla Indian Reservation
 Confederated Tribes of the Warm Springs Reservation of Oregon
 Nez Perce Tribe
 Oregon Department of Fish & Wildlife
 United States Fish & Wildlife
 Oregon Department of Environmental Quality
 LWG Legal
 LWG Repository